



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

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March 7, 2025

By ECF

Honorable Margaret M. Garnett
 U.S. District Court Judge
 United States District Court
 Southern District of New York
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007

Elise M. Bloom
 Member of the Firm
 d +1.212.969.3410
 f 212.969.2900
 ebloom@proskauer.com
 www.proskauer.com

Re: *Benedict, et al v. Manfred, et al*
 Civil Action No. 24-cv-04314 (MMG)

Dear Judge Garnett:

The parties write jointly pursuant to your January 29, 2025 Order concerning a schedule for briefing on Defendants' Motion to Dismiss and for conducting discovery. (Dkt. 97 at 4). The parties have met and conferred, and propose that Plaintiffs' opposition be due on March 31, 2025, and Defendants' reply be due on April 30, 2025. Plaintiffs reserve the right to request to file a sur-reply. Defendants intend to oppose any such request.

In addition, the parties have agreed to stay discovery pending the Court's disposition of Defendants' Motion to Dismiss. However, Plaintiffs reserve the right to seek jurisdictional discovery. Defendants intend to oppose any request for jurisdictional discovery.

Thank you for your attention to this matter.

Respectfully submitted,

PROSKAUER ROSE LLP*s/ Elise M. Bloom*

Elise M. Bloom
 Neil H. Abramson
 Adam M. Lupion

Counsel for all Defendants other than Baltimore
 Orioles Limited Partnership Inc.

FAEGRE DRINKER BIDDLE & REATH LLP*s/ Desmonne A. Bennett*

GRANTED. Plaintiffs' opposition is due on **March 31, 2025**, and Defendants' reply is due on **April 30, 2025**. Discovery is stayed pending the Court's disposition of Defendants' motion to dismiss, without prejudice to any request Plaintiffs may make to seek jurisdictional discovery.

SO ORDERED. Dated March 11, 2025.

HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE



Hon. Margaret M. Garnett
March 7, 2025
Page 2

Lawrence G. Scarborough
Desmonne A. Bennett (*admitted pro hac vice*)

Counsel for Baltimore Orioles Limited Partnership
Inc.

KILGORE & KILGORE, PLLC

/s/ Eric N. Roberson

Eric N. Roberson
Counsel for Plaintiffs